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Attorneys for Defendant PAUL BETENBAUGH

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

SAFECO INSURANCE COMPANY OF
AMERICA, a corporation,

Plaintiff,

vs.

PAUL BETENBAUGH, an individual;
DALAS L. GUNDERSEN, an individual.

Defendant.

Case No. 2:21-CV-01761-TLN-CKD

**STIPULATION AND ORDER
MODIFYING THE INITIAL PRETRIAL
SCHEDULING ORDER**

Action Filed: 09/27/2021

Hon. Judge Troy L. Nunley

Pursuant to this Court's September 28, 2021 Initial Pretrial Scheduling Order (ECF No. 4), Fed. Rule of Civ. Proc. 16(b)(4), Local Rule 143, and a showing of good cause, the parties in the above action hereby submit the following stipulation and proposed order to modify the scheduling order.

Whereas, the parties in the above action agree that a 90 day extension of the deadlines in this Court's September 28, 2021 Initial Pretrial Scheduling Order (ECF No. 4) is reasonable, necessary, and appropriate to permit completion of appropriate discovery, including any potential motions related thereto, prior to the disclosure of expert witnesses, dispositive motions and pretrial proceedings.

Whereas, the parties have not made any prior requests to modify the scheduling order.

IT IS HEREBY STIPULATED by the parties, through their counsel of record, that the current deadlines in the Initial Pretrial Scheduling Order (ECF No. 4) entered by this Court on September 28, 2021 are extended as follows:

- All discovery, with the exception of expert discovery, shall be completed no later than December 19, 2022;
- Designation of expert witnesses and reports shall be filed and served no later than February 17, 2023;
- Designation of any supplemental list of expert witnesses who will express an opinion on a subject covered by an expert designated by an adverse party shall be exchanged no later than March 20, 2023; and June 17, 2023.

Except as modified, the Court's Initial Scheduling Order (ECF No. 4) remains unchanged.

IT IS SO STIPULATED

Dated: August 10, 2022

FARMER CURTIS, LLP

By: /s/ Craig E. Farmer
CRAIG E. FARMER
DAWN D. CURTIS
Attorneys for Defendant PAUL BETENBAUGH

Dated: August 10, 2022

ROPERS MAJESKI PC

By: /s/ Birgit Huber Willand
BLAKE J. RUSSUM
BIRGIT HUBER WILLAND
Attorneys for Plaintiff SAFECO INSURANCE
COMPANY OF AMERICA

Electronic signature authorized on August 2, 2022

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1 Dated: August 10, 2022

GARNER & ASSOCIATES, LLP

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3 By: /s/ John R. Garner
4 JOHN R. GARNER
5 PETER C.I. CHEN
6 Attorneys for Defendant DALAS GUNDERSEN

7 Electronic signature authorized on August 10, 2022
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ORDER

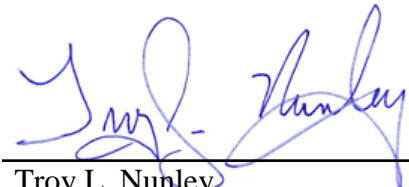
Pursuant to the parties above stipulation and for good cause shown, IT IS HEREBY ORDERED that the Initial Pretrial Scheduling Order (ECF No. 4) is modified as follows:

- All discovery, with the exception of expert discovery, shall be completed no later than December 19, 2022;
- Designation of expert witnesses and reports shall be filed and served no later than February 17, 2023;
- Designation of any supplemental list of expert witnesses who will express an opinion on a subject covered by an expert designated by an adverse party shall be exchanged no later than March 20, 2023; and June 17, 2023.

Except as modified, the Court's Initial Scheduling Order remains unchanged.

IT IS SO ORDERED.

Dated: August 10, 2022



Troy L. Nunley
United States District Judge

Farmer Curtis, LLP